

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

TILLIE SALTZMAN, Individually And On Behalf  
Of All Others Similarly Situated,

Plaintiff,

V.

CITIGROUP INC., CHARLES O. PRINCE,  
ROBERT E. RUBIN, STEPHEN R. VOLK,  
SALLIE L. KRAWCHECK, GARY L.  
CRITTENDEN and ROBERT DRUSKIN,

Defendants.

07 CV 09901 (SHS) (FM)

CLASS ACTION

ECF CASE

LENNARD HAMMERSCHLAG, Individually  
And on Behalf of All Others Similarly Situated,

Plaintiff,

V.

CITIGROUP INC., CHARLES PRINCE, SALLIE  
KRAWCHECK and GARY CRITTENDEN,

Defendants.

07 CV 10258 (SHS)

CLASS ACTION

**NOTICE OF MOTION OF DAVID GARDEN FOR  
CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF PURSUANT TO  
§21D(a)(3)(B) OF THE SECURITIES EXCHANGE ACT OF 1934  
AND APPROVAL OF SELECTION OF LEAD COUNSEL**

PLEASE TAKE NOTICE that Movant David Garden, upon the Declaration of Joseph H. Weiss dated January 7, 2008, and the exhibits annexed thereto, the accompanying Memorandum of Law, all of the prior pleadings and proceedings had herein, and such other evidence as the Court may consider at the hearing on this motion, hereby respectfully moves this Court for an order in the form filed herewith: (i) consolidating the related actions captioned above; (ii) appointing David Garden as Lead Plaintiff in the action pursuant to the Private Securities Litigation Reform Act of 1995; and (iii) approving Movant's selection of Lead Counsel.

Dated: January 7, 2008

Respectfully submitted,

**WEISS & LURIE**

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**Counsel for Movant David Garden and  
Proposed Lead Counsel For Plaintiff and  
The Class**